

SIMONS HALL JOHNSTON PC
6490 S. McCarran Blvd., Ste. F-46
Reno, NV 89509
Phone: (775) 785-0088

1 ANTHONY L. HALL, ESQ.
Nevada Bar No. 5977
2 AHall@SHJNevada.com
JEREMY B. CLARKE, ESQ.
3 Nevada Bar No. 13849
JClarke@SHJNevada.com
4 SIMONS HALL JOHNSTON PC
6490 S. McCarran Blvd., Ste. F-46
5 Reno, Nevada 89509
Telephone: (775) 785-0088
6 *Attorneys for Plaintiff Jaime Martorell*

7
8
9
10
11 **THE UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 JAIME MARTORELL, an individual,

14
15 Plaintiff

16 v.

17 DEBASHIS BAGCHI, an individual, and
18 JON BENGSTON, an individual,

19 Defendants.
20
21

Case No.: 3:19-cv-00523-MMD-CLB

**STIPULATION TO EXTEND DEADLINES
TO FILE OPPOSITIONS AND REPLIES
RE: MOTIONS FOR SUMMARY
JUDGMENT**

[First Request]

22 Plaintiff Jaime Martorell (“Plaintiff” or “Martorell”) and Defendants Debashis Bagchi and
23 Jon Bengston (“Defendants”) (collectively, at times, the “Parties”), by and through their respective
24 counsel, hereby stipulate and agree to extend the deadlines by which to file Oppositions and Replies
25 related to their respective Motions for Summary Judgment (Motions). Cross Motions were filed on
26 December 10, 2020. [ECF Nos. 77, 78, and 79]. Oppositions to the Motions were then due on
27 December 24, 2020. However, to accommodate the schedules and workloads of counsel the parties
28 have agreed to extend the deadline to these Oppositions to January 6, 2021. Consistent with LR

1 7.2(b) the deadline to File Replies becomes January 20, 2021.

2 This is the first request of an extension of these deadlines, is made in good faith to, is not
3 made for the purpose of delay, and will not result in any undue delay or prejudice.

4
5 DATED this 14th day of December 2020.

DATED this 14th day of December, 2020.

6 BY: /s/ Anthony L. Hall

BY: /s/ Pete Cladianos

7 Anthony L. Hall, Esq.
8 Jeremy B. Clarke, Esq.
9 Simons Hall Johnston PC
10 6490 S. McCarran Blvd., Ste. F-46
11 Reno, Nevada 89509
12 Tel: (775) 785-0088
13 ahall@shjnevada.com
14 jclarke@shjnevada.com

Charles R. Zeh, Esq.
Pete Cladianos III, Esq.
The Law Offices of Charles R. Zeh, Esq.
50 West Liberty Street, Suite 950
Reno, NV 89501
Tel: (775) 323-5700
crzeh@aol.com
pete@crzehlaw.com

11 *Attorneys for Plaintiff*

Attorneys for Defendants

12 **IT IS SO ORDERED.**

13 
14 **UNITED STATES DISTRICT JUDGE**

15 DATED: December 15, 2020
16
17
18
19
20
21
22
23
24
25
26
27
28

SIMONS HALL JOHNSTON PC
6490 S. McCarran Blvd., Ste. F-46
Reno, NV 89509
Phone: (775) 785-0088